

**EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET
SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230**

Granted to the extent that the matters will be consolidated for purposes of the contemplated motion for bail. A consolidated bail hearing in both 12 Crim. 537 and 20 Mag. 1001 will be held by this court. The parties are directed to consult with each other and submit a proposed briefing schedule.

So ordered: 4/8/20

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Filed on ECF



J. PAUL OETKEN
United States District Judge

Re: *United States v. Joseph Falu*
20 Mj. 1001
12 Cr. 537 (JPO)

Dear Judge Oetken:

We represent the defendant Joseph Falu pursuant to the Criminal Justice Act in the case currently docketed as 20 Mj. 1001. With Mr. Falu's permission, and after discussions with counsel of record, Nicole Friedlander, we have filed a Notice of Appearance in 12 Cr. 537 (JPO), Mr. Falu's VOSR case currently before Your Honor.

Based in large part on the current COVID-19 crisis, we intend to make a bail motion on Mr. Falu's behalf in both cases simultaneously. In order to allow us to do that, we respectfully request that Your Honor do one of the following: (1) consolidate both cases now before this Court; (2) consolidate both cases before the Court only for purposes of deciding our intended bail motion; or (3) refer both cases together to the Magistrate to decide our bail motion.

Please do not hesitate to contact us if you have any questions.

Respectfully submitted,

/s/ Sarah M. Sacks